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VIA ECFS

October 6, 2010

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: Notice of *ex parte* Presentation, CS Docket No. 97-80, PP Docket No. 00-67

Dear Ms. Dortch:

On October 5, 2010, the undersigned in his capacity as a consultant to Nagravision met in separate meetings with Rosemary Harold, Legal Advisor to Commissioner McDowell; Bradley Gillen, Legal Advisor to Commissioner Attwell Baker and Krista L. Witanowski, Acting Legal Advisor to Commissioner Attwell Baker; Eloise Gore, Acting Legal Advisor to Commissioner Clyburn; and with Alison Neplokh, Brendan Murray, Steve Broeckert and Jeff Neumann of the Media Bureau.

The discussions in these meetings were limited to positions Nagravision has previously taken in the docket. Namely, that the Commission should define what is meant by “hardware-oriented conditional access solutions”<sup>1</sup> in the meaning of the Second Report and Order. Additionally the conversations with Ms. Harold, Mr. Gillen and Ms. Witanowski included discussions on Nagravision’s positions that the Commission should grant relief from CableCARD requirements for one-way navigation devices that do not have recording functions, and that the Commission should make provision for separable security at cable head-ends via Simulcrypt technology.

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<sup>1</sup> *Implementation of Section 304 of the Telecommunications Act of 1996: Commercial Availability of Navigation Devices*, Second Report and Order, 20 FCC Rcd. 6794, 70 FR 36040 (2005) at ¶ 35.

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In accordance with §1.1206 of the Commission's Rules, one copy of this letter is being filed electronically via ECFS, and delivered via email to the attendees.

Kind regards,

/s/

Adam Goldberg

Principal

AGP, LLC

Cc: Rosemary Harold  
Bradley Gillen  
Krista L. Witanowski  
Eloise Gore  
Alison Neplokh  
Brendan Murray  
Steve Broeckert  
Jeff Neumann